

Judge Buchwald

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- V. -

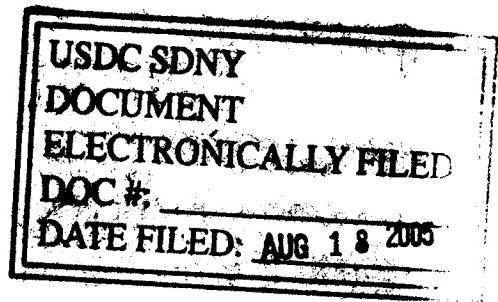
JERMAINE PARSONS,
DEVON ARCHER,
MICHAEL THOMPSON,
GREGORY COOPER,
ALEXANDER RIVERA,
JOSE GONZALEZ,
EMMANUEL SYLVESTRE,
CHANCE BROWN,
EDDIE RICHARDSON,
SAMUEL FOGG,
KENNEDY BROWN,
JASON AROCHO,
SHAWN ROSS, and
SHARIFF SIMPSON,

Defendants.

05 Cr. 05CRIM. 862

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SEALED INDICTMENT



COUNT ONE

The Grand Jury charges:

1. From at least in or about 2003 up to and including
in or about July 2005, in the Southern District of New York and
elsewhere, JERMAINE PARSONS, DEVON ARCHER, MICHAEL THOMPSON,
GREGORY COOPER, ALEXANDER RIVERA, JOSE GONZALEZ, EMMANUEL
SYLVESTRE, CHANCE BROWN, EDDIE RICHARDSON, SAMUEL FOGG, KENNEDY
BROWN, JASON AROCHO, SHAWN ROSS, and SHARIFF SIMPSON, the
defendants, and others known and unknown, unlawfully,
intentionally, and knowingly combined, conspired, confederated,
and agreed together and with each other to violate the narcotics
laws of the United States.

2. It was a part and an object of the conspiracy that JERMAINE PARSONS, DEVON ARCHER, MICHAEL THOMPSON, GREGORY COOPER, ALEXANDER RIVERA, JOSE GONZALEZ, EMMANUEL SYLVESTRE, CHANCE BROWN, EDDIE RICHARDSON, SAMUEL FOGG, KENNEDY BROWN, JASON AROCHO, SHAWN ROSS, and SHARIFF SIMPSON, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly would and did distribute and possess with intent to distribute a controlled substance, to wit, one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Sections 812, 841(a)(1), and 841(b)(1)(A) of Title 21, United States Code.

Means and Methods of the Conspiracy

3. Among the means and methods employed in conducting and participating in the conduct of the conspiracy were the following:

a. The above-named defendants participated in a criminal organization in the Bronx that controlled a block-long strip of Decatur Avenue between East 195th and East 197th Street. The defendants operated out of the following buildings, among others, on that block: 2704 Decatur Avenue, 2712 Decatur Avenue, 2720 Decatur Avenue, 2721 Decatur Avenue, 2726 Decatur Avenue and 2730 Decatur Avenue.

b. From in or about 2003 through in or about July 2005, the defendants sold heroin all day and into the night in, among other places, the lobbies of several of the residential

apartment buildings along Decatur Avenue, conducting thousands of hand-to-hand heroin transactions. At times during the conspiracy, the defendants conducted approximately 20 to 30 heroin transactions a day.

c. The defendants sold individual "glassine" bags of heroin, typically stamped with "brand" names, such as "Top Gun," "Tier 111," "Gateway," "Dynasty," "Second To None," and "Happy Land."

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, JERMAINE PARSONS, DEVON ARCHER, MICHAEL THOMPSON, GREGORY COOPER, ALEXANDER RIVERA, JOSE GONZALEZ, EMMANUEL SYLVESTRE, CHANCE BROWN, EDDIE RICHARDSON, SAMUEL FOGG, KENNEDY BROWN, JASON AROCHO, SHAWN ROSS, and SHARIFF SIMPSON, the defendants, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about September 5, 2003, GREGORY COOPER, the defendant, sold glassine envelopes containing heroin stamped with the brand name "Top Gun" to another person in the vicinity of 2730 Decatur Avenue in the Bronx.

b. On or about October 20, 2004, JERMAINE PARSONS, DEVON ARCHER, MICHAEL THOMPSON and GREGORY COOPER, the defendants, sold glassine envelopes containing heroin stamped with the brand name "Double Trouble" to an undercover police

officer ("UC-1") in the vicinity of 2726 Decatur Avenue in the Bronx.

c. On or about November 1, 2004, JERMAINE PARSONS, DEVON ARCHER, and GREGORY COOPER, the defendants, sold glassine envelopes containing heroin stamped with the brand name "Top Gun" to UC-1 in the vicinity of 2726 Decatur Avenue in the Bronx.

d. On or about November 9, 2004, JERMAINE PARSONS, the defendant, sold glassine envelopes containing heroin stamped with the brand name "Death Warrant" to UC-1 in the vicinity of 2730 Decatur Avenue.

e. On or about November 17, 2004, JASON ARROCHO, the defendant, possessed glassine envelopes containing heroin stamped with the brand name "Death Warrant" in the vicinity of 2735 Webster Avenue.

f. On or about December 29, 2004, ALEXANDER RIVERA and JOSE GONZALEZ, the defendants, sold glassine envelopes containing heroin stamped with the brand name "Top Gun" to another person in the vicinity of 2712 Decatur Avenue.

g. On or about January 4, 2005, JERMAINE PARSONS and JOSE GONZALEZ, the defendants, sold glassine envelopes containing heroin stamped with the brand name "Dead Presidents" to UC-1 in the vicinity of 2721 Decatur Avenue in the Bronx.

h. On or about February 22, 2005, JERMAINE PARSONS, the defendant, sold glassine envelopes containing heroin

stamped with the brand names "Gateway," "Dynasty" and "Rush Hour" to UC-1 in the vicinity of East 195th Street and Webster Avenue in the Bronx.

i. On or about March 3, 2005, EMMANUEL SYLVESTRE, the defendant, sold glassine envelopes containing heroin stamped with the brand name "Tier 111" to UC-1 in the vicinity of East 198th Street and Webster Avenue in the Bronx.

j. On or about March 23, 2005, EMMANUEL SYLVESTRE, the defendant, sold glassine envelopes containing heroin to an undercover police officer in the vicinity of 2726 Decatur Avenue in the Bronx.

k. On or about March 30, 2005, JERMAINE PARSONS, the defendant, sold glassine envelopes containing heroin stamped with the brand name "Second To None" to UC-1 in the vicinity of 2726 Decatur Avenue in the Bronx.

l. On or about March 31, 2005, DEVON ARCHER, the defendant, possessed glassine envelopes containing heroin stamped with the brand name "Tier 111" in the vicinity of 2333 Creston Avenue in the Bronx.

m. On or about April 5, 2005, JERMAINE PARSONS, the defendant, sold glassine envelopes containing heroin stamped with the brand name "Second To None" to UC-1 in the vicinity of East 197th Street and Decatur Avenue in the Bronx.

n. On or about April 5, 2005, JASON AROCHO, the defendant, met with another person for the purpose of conducting a narcotics transaction in the vicinity of 2712 Decatur Avenue in the Bronx.

o. On or about April 8, 2005, SHAWN ROSS, the defendant, met with another person for the purpose of conducting a narcotics transaction in the vicinity of 2726 Decatur Avenue in the Bronx.

p. On or about April 8, 2005, SAMUEL FOGG, the defendant, met with another person for the purpose of conducting a narcotics transaction in the vicinity of 2726 Decatur Avenue in the Bronx.

q. On or about April 12, 2005, SHAWN ROSS and JERMAINE PARSONS, the defendants, met with another person for the purpose of conducting a narcotics transaction in the vicinity of 2726 Decatur Avenue in the Bronx.

r. On or about April 17, 2005, CHANCE BROWN, the defendant, met with another person for the purpose of conducting a narcotics transaction in the vicinity of 2726 Decatur Avenue in the Bronx.

s. On or about April 21, 2005, JERMAINE PARSONS, the defendant, met with SHARIFF SIMPSON, the defendant, for the purpose of conducting a narcotics transaction in the vicinity of 2726 Decatur Avenue in the Bronx.

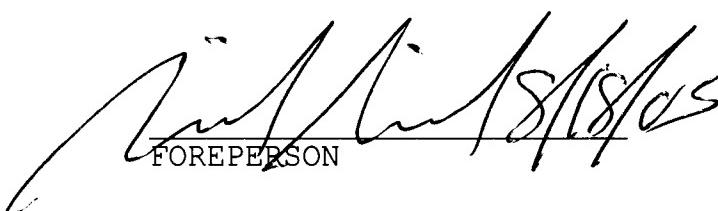
t. On or about May 20, 2005, EDDIE RICHARDSON, the defendant, sold glassine envelopes containing heroin stamped with the brand name "Gateway" to another person in the vicinity of 2726 Decatur Avenue in the Bronx.

u. On or about June 3, 2005, KENNEDY BROWN, the defendant, sold glassine envelopes containing heroin stamped with the brand name "Happy Land" to another person in the vicinity of 2726 Decatur Avenue in the Bronx.

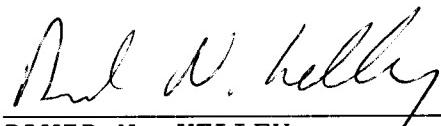
v. On or about June 3, 2005, JERMAINE PARSONS, the defendant, sold glassine envelopes containing heroin stamped with the brand names "24 Hour," "Sunoco," and "Happy Land" to UC-1 in the vicinity of Marion Avenue and East 197th Street in the Bronx.

w. On or about July 26, 2005, JERMAINE PARSONS, the defendant, sold glassine envelopes containing heroin stamped with the brand names "Nyquil" and "Happy Land" to UC-1 in the vicinity of 2075 Boston Road in the Bronx.

(Title 21, United States Code, Section 846.)



FOREPERSON



DAVID N. KELLEY
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SHAWN ROSS, and
SHARIFF SIMPSON,

Defendants.

INDICTMENT

05 Cr.

(21 U.S.C. §§ 812, 841, 846)

A TRUE BILL

DAVID N. KELLEY
United States Attorney.

8/18/05
Foreperson.